



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 28, 2011

BRENT ANDERSEN, TREASURER
MASSACHUSETTS REPUBLICAN STATE CONGRESSIONAL
COMMITTEE
85 MERRIMAC STREET, SUITE 400
BOSTON, MA 02114

Response Due Date
06/02/2011

IDENTIFICATION NUMBER: C00042622

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/14/2010 - 11/22/2010),
RECEIVED 12/02/2010

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 8 item(s):

1. Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.
2. Schedule B of your report discloses a transfer(s) totaling \$89,450 to what appears to be a non-federal account of your committee. Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts must allocate their expenses pursuant to 11 CFR §106.6(d). Please provide further clarification regarding this transfer(s).
3. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(c) prohibit a State, district or local party committee (combined) from receiving any contribution from a person or non-multicandidate political committee in excess of \$10,000 per calendar year.

MASSACHUSETTS REPUBLICAN STATE CONGRESSIONAL COMMITTEE

Page 2 of 4

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

4. A review of the reports filed by your committee (see attached) indicates that your committee received one or more transfers from the "Republican National Committee" which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

MASSACHUSETTS REPUBLICAN STATE CONGRESSIONAL COMMITTEE

Page 3 of 4

5. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 21(b) of your report to clarify the following description(s): "consulting" and "event fee." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

6. Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Contributions from other political committees and transfers from affiliated committees should be properly disclosed on a separate Schedule(s) A, supporting Line(s) 11(c) and 12, respectively of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

7. Schedule B supporting Line 21(b) of your report discloses a payment(s) for "polling" and "polling fee" which appears to be disclosed on the wrong line of the Detailed Summary Page. Please be advised that Voter Identification, Generic Campaign and Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity. 11 CFR §100.24 Please amend your report to properly disclose this activity on Line 30(b) or provide clarification regarding this activity.

8. Please clarify all expenditures made for "event rental," "event supplies," "event supplies rental," "food expense," "fundraising consultant fee," and "hotel rental" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

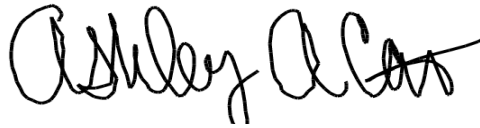
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

MASSACHUSETTS REPUBLICAN STATE CONGRESSIONAL COMMITTEE

Page 4 of 4

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1173.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley Carter". The signature is fluid and cursive, with the first name "Ashley" being more prominent than the last name "Carter".

Ashley Carter
Campaign Finance Analyst
Reports Analysis Division

Excessive Contribution From a Individual

Contributor Name	Date	Amount	Report
John Dalton	6/29/10	\$10,000	2010 July Monthly
John Dalton	7/29/10	-\$5,000	2010 August Monthly
John Dalton	10/23/10	\$5,000	2010 30 Day Post-General
John Dalton	10/23/10	\$500	2010 30 Day Post-General
Doris Hearty	10/22/10	\$5,000	2010 30 Day Post-General
Doris Hearty	10/28/10	\$10,000	2010 30 Day Post-General
Richard Henken	6/18/10	\$5,000	2010 July Monthly
Richard Henken	10/21/10	\$10,000	2010 30 Day Post-General
Steven Wymer	10/30/10	\$15,000	2010 30 Day Post-General

Transfer Received Not Disclosed by Donor Committee

Contributor Name	Date	Amount	Report
Republican National Committee	11/10/10	\$28,000	2010 30 Day Post-General